

Sara B. Brody (SBN 130222)
sbrody@sidley.com
Sarah A. Hemmendinger (SBN 298659)
shemmendinger@sidley.com
Sarah E. Gallo (SBN 335544)
sgallo@sidley.com
SIDLEY AUSTIN LLP
555 California Street, Suite 2000
San Francisco, CA 94104
Telephone: 415 772 1279

Matthew J. Dolan (SBN 291150)
mdolan@sidley.com
SIDLEY AUSTIN LLP
1001 Page Mill Road, Building 1
Palo Alto, CA 94304
Telephone: 650 565 7106

Robin E. Wechkin (admitted *pro hac vice*)
rwechkin@sidley.com
SIDLEY AUSTIN LLP
8426 316th Place Southeast
Issaquah, WA 98027
Telephone: 415 439 1799

Attorneys for Defendant Gerrit Klaerner

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

MICHAEL PARDI, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

TRICIDA, INC., and GERRIT KLAERNER,

Defendant.

Case No. 4:21-cv-00076-HSG

CLASS ACTION

**JOINT STIPULATION AND ORDER TO
EXTEND CASE DEADLINES BY 30 DAYS**

Assigned to: Hon. Haywood S. Gilliam, Jr.

1 Lead Plaintiff Jeffrey Fiore (“Lead Plaintiff”) and Defendant Gerrit Klaerner (“Defendant”
2 and together with Lead Plaintiff, the “Parties”) by and through their undersigned counsel, hereby
3 stipulate as follows:

4 **WHEREAS**, on November 13, 2024, the Parties filed a Joint Notice of Pending Settlement
5 (Dkt. 201) and a Joint Motion for a Stay to Facilitate Settlement (Dkt. 202).

6 **WHEREAS**, on November 13, 2024, the Court granted the Parties’ stay motion, and ordered
7 that all proceedings in this matter, including all discovery and case deadlines shall be stayed pending
8 finalization of the settlement documentation and a ruling on Lead Plaintiff’s Motion for Preliminary
9 Approval of Settlement. Dkt. 204. The Order stated that if the Motion for Preliminary Approval of
10 Settlement is not filed by December 30, 2024, the Parties shall file a joint status report regarding the
11 status of settlement. *Id.*

12 **WHEREAS**, Lead Plaintiff sent Defendant a draft Stipulation of Settlement and
13 accompanying exhibits on December 3, 2024.

14 **WHEREAS**, Defendant is still reviewing the draft documents Lead Plaintiff sent.

15 **WHEREAS**, the Parties are continuing to draft a confidential opt out agreement.

16 **WHEREAS**, the Parties have met and conferred and agree that it would serve the interests of
17 efficiency and conserve resources to extend the December 30, 2024 deadline for Lead Plaintiff to file
18 the Motion for Preliminary Approval of Settlement or for the Parties to file a joint report regarding
19 the status of settlement by an additional 30 days to January 29, 2025.

20 **NOW THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE**, pursuant
21 to Civil L.R. 6-2, by and through their undersigned counsel:

- 22 1. The December 30, 2024 deadline either for Lead Plaintiff to file a Motion for Preliminary
23 Approval of Settlement or for the Parties to file a joint report regarding the status of the
24 settlement shall be extended by 30 days to January 29, 2025.

Date: December 30, 2024

Respectfully submitted,

SIDLEY AUSTIN LLP

By: /s/ Sara B. Brody

Sara B. Brody (SBN 130222)

Attorneys for Defendant Gerrit Klaerner

By: /s/ Jacob A. Walker

Jacob A. Walker (SBN 271217)

BLOCK & LEVITON LLP

400 Concar Drive

San Mateo, CA 94402

(650) 781-0025 phone

jake@blockleviton.com

Jeffrey C. Block, *pro hac vice*

Michael D. Gaines, *pro hac vice*

BLOCK & LEVITON LLP

260 Franklin Street, Suite 1860

Boston, MA 02110

(617) 398-5600 phone

(617) 507-6020 fax

jeff@blockleviton.com

michael@blockleviton.com

*Attorneys for Lead Plaintiff Jeffrey M. Fiore
and the Class*

LOCAL RULE 5-1 ATTESTATION

I, Sara B. Brody, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order. In compliance with Local Rule 5-1(i)(3), I hereby attest that the other signatory to this document concurred in the filing of this document.

Date: December 30, 2024

By: /s/ Sara B. Brody

Sara B. Brody

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 12/30/2024

A handwritten signature in black ink, reading "Haywood S. Gilliam, Jr.", is written over a horizontal line.

Honorable Haywood S. Gilliam, Jr.
United States District Judge